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MEMO ENDORSED

The Application is granted.

SO ORDERED:


Paul G. Gardephe, U.S.D.J.

Dated: Dated: December 29, 2020

December 28, 2020

VIA ECF

Hon. Paul G. Gardephe
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Re: United States v. Ramirez et al., No. 1:98-cr-00438-PGG-12

Dear Judge Gardephe:

I represent Manuel Gonzalez ("Mr. Gonzalez") in the above-captioned matter and write to respectfully move this Court for a one week extension on our time to submit Mr. Gonzalez's resentencing submission, currently due this Wednesday, December 30 (ECF 405). If this motion is granted, the submission would be due next Wednesday, January 6.

We sent Mr. Gonzalez the current draft of the resentencing submission via Express Mail on Tuesday, December 22. However, my colleague Tim Fleming spoke with Mr. Gonzalez today, and confirmed that, as of 12:30 this afternoon, he had not received the materials. We understand from Mr. Gonzalez's case manager that due to a coronavirus outbreak at FCI Fort Dix, where Mr. Gonzalez is currently incarcerated, it will be difficult to arrange legal calls in the short term, and a search on the Federal Bureau of Prison's coronavirus page confirms there are currently 150 active cases of coronavirus among inmates and 10 among staff members. *See COVID 19 Coronavirus*, BOP.GOV, <https://www.bop.gov/coronavirus/> (last visited December 28, 2020). The requested one week extension would provide the time needed to secure the necessary approvals.

Assistant United States Attorney Michael D. Lockard has informed us that the Government has no objection to this request.

This is Mr. Gonzalez's first request for an extension of time to file his resentencing submission, the Government previously requested, and received, an 90-day adjournment of the resentencing proceeding when Mr. Gonzalez was unable to travel for medical reasons. (*See* ECF 405).

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Respectfully submitted,

/s/ Michael S. Schachter

Michael S. Schachter

cc: All counsel of record.